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LAWYERS

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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA COMMERCIAL MORTGAGE
COMPANY,

USA CAPITAL REALTY ADVISORS,
LLC,

USA CAPITAL DIVERSIFIED TRUST
DEED FUND, LLC,

USA CAPITAL FIRST TRUST DEED
FUND, LLC,

USA SECURITIES, LLC,
Debtors.

Affects:

- ☐ All Debtors
- ☒ USA Commercial Mortgage Company
- ☐ USA Capital Realty Advisors, LLC
- ☐ USA Capital Diversified Trust Deed Fund, LLC
- ☐ USA Capital First Trust Deed Fund, LLC
- ☐ USA Securities, LLC

Case No. BK-S-06-10725-LBR
Case No. BK-S-06-10726-LBR
Case No. BK-S-06-10727-LBR
Case No. BK-S-06-10728-LBR
Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under Case No.
BK-S-06-10725 LBR

**SECOND STIPULATION
CONTINUING HEARING ON
OBJECTION TO CLAIM 1279 OF
LERIN HILLS**

Date of Hearing: June 15, 2007
Time of Hearing: 9:30 a.m.

New Date of Hearing: October 15, 2007
Time of Hearing: 9:30 a.m.

USACM Liquidating Trust (the "USACM Trust"), by and through its counsel,
Lewis and Roca LLP, and Lerin Hills Ltd. by and through its counsel, Kehoe &
Associates, hereby stipulate:

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1 1. The USACM Trust filed an objection to Claim No. 1279 of Lerin Hills Ltd.
2 filed in the amount of \$1,257,233.40 as an unsecured non-priority claim and a priority
3 claim of \$797,175.62.

4 2. The matter was originally set for status hearing on April 26, 2007 at 9:30
5 a.m. Pursuant to a stipulation [DE 3392] and order [DE 3393] the hearing was continued
6 to June 15, 2007 at 9:30 a.m.

7 3. Counsel for the USACM Liquidating Trust requests additional time to
8 negotiate with the Claimants' counsel over investigation and prosecution of the Claims
9 and the objections.

10 4. In order to facilitate that negotiation, the parties agree that the hearing on the
11 objection filed by the USACM Trust to Claim No. 1279 of Lerin Hills Ltd. in the amount
12 of \$1,257,233.40 as an unsecured non-priority claim and a priority claim of \$797,175.62
13 be continued to **October 15, 2007 at 9:30 a.m.**

14 5. The parties submit a stipulated order for the Court's convenience.

15 DATED: June 11, 2007.

16
17 **LEWIS AND ROCA LLP**

18 By: /s/ RC (#6593)

19 Susan M. Freeman, AZ 4199 (*pro hac vice*)

20 Rob Charles, NV 6593

21 Counsel for USACM Liquidating Trust

22 -and-

23 **KEHOE & ASSOCIATES**

24 By: /s/ TEK (# 6011) 

25 Ty E. Kehoe, Esq.

26 871 Coronado Center Drive, Suite 200

Henderson, NV 89052

Attorney for Lerin Hills, Ltd.